

## REMARKS

Reconsideration of the present application is respectfully requested. Claims 1-17, 24 and 30-34 have been amended. No claims have been canceled. No new claims have been added in this response. No new matter has been added.

### Claim Rejections - §101

Claims 1-16 and 30-34 stand rejected under 35 USC §101. Specifically, the Examiner alleges that claims 1-16 are directed to an abstract idea rather than a practical application of the idea. Applicants respectfully disagree. As recited in claim 1, the method is directed to animate an image object stored in an image cache of a device over a time period in response to a the motion command. Thus, the method recited in claim 1 is not directed to an abstract idea, and it provides tangible result, namely, animating an image object.

Regarding claims 30-34, Applicants amended the claims to recite a “machine-readable storage medium”. Thus, the rejections to claims 30-34 are believed to be overcome.

### Claim Rejections - §103(a)

Independent claims 1, 17, 24 and 30 stand rejected under 35 USC §103(a) based on Richardson et al. (NPL Document “The RFB Protocol”, hereinafter “Richardson”). Applicants respectfully traverse the rejections.

Claim 1, as currently amended, recites:

1. In a device comprising an image cache, a method comprising:

receiving, from another device, a motion command, wherein **the motion command, without including pixel values generated by the another device, directs animation of an image object stored in the image cache over a time period**, and

updating a frame buffer of the device with the image object of the image cache over the time period to animate the image object per the motion command. (Emphasis added).

Richardson does not teach or suggest the above emphasized limitation.

Richardson discloses a protocol for remote access to graphical user interfaces (Richardson, page 1). According to the protocol, an RFB client sends an RFB server a request to update a graphical user interface of the RFB client (Richardson, page 2). In response to the request, the RFB server sends a framebuffer update that consists of a sequence of rectangles of pixel data which the client should put into its framebuffer (Richardson, page 21). Thus, the protocol disclosed in Richardson sends pixel values generated by the RFB server to the RFB client to be used by the RFB client to update its local framebuffer. In contrast, the motion command recited in claim 1 directs the device to animate an image object stored in the device's image cache, but does not include pixel values generated by the another device (the RFB server, for example).

The method recited in claim 1 is also not obvious based on Richardson. As disclosed in Richardson, the RFB client is just a thin client of the RFB server, because the RFB client uses the pixel values calculated by the RFB server to update its local framebuffer. Thus, the RFB client relies heavily on the computation power of the RFB server. In addition, compared with transmitting a command, such as one described in the specification of the present invention, transmitting pixel values requires more data to be transmitted across the network. Thus, the protocol is easily affected by the condition of the network. The method of claim 1 avoids the above described problems by using

commands, which require less data to be transmitted and does not require the server to calculate pixel values.

Thus, at least for the above reasons, claim 1 and all claims which depend on it are patentable over Richardson.

Independent claims 17, 24 and 30 each recites limitation similar to that discussed above for claim 1. For similar reasons, claims 17, 24, 30 and all claims which depend on them are also patentable over Richardson.

#### Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

In light of the comments above, the Applicant respectfully requests the allowance of all claims.


#### CONCLUSION

Applicant respectfully submits that all rejections have been overcome and that all pending claims are in condition for allowance.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Michael J. Mallie at (408) 720-8300.

Respectfully Submitted,  
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